UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

JOANN NAGY,	
Plaintiff,	2:18-cv-01649-GMN-DJA
V.	2.10-CV-01049-GWN-DDA
BELLAGIO, LLC, et al.,	
Defendants	

STIPULATION TO EXTEND TIME FOR FILING PRETRIAL ORDER

(First Request)

COME NOW the Plaintiff, Joann Nagy, by and through her counsel of record, Budow and Noble, P.C. and Walter E. Gillcrist, Jr., Dennett Winspear, LLP and Gina Winspear, and Defendant, Bellagio, LLC, by and through its counsel of record, Lincoln, Gustafson & Cercos, LLP and Loren S. Young, and hereby submits this Stipulation to Extend Time for Filing Pretrial Order and state as follows:

- 1. This is an action for personal injuries alleged to have been sustained by the Plaintiff, Joann Nagy, in a slip and fall incident at the Defendant's hotel. Liability and damages are disputed.
- 2. Pursuant to this Court's Order, the Pretrial Order is due to be filed on November 6, 2019. There has been no previous request for extension of time as to the Pretrial Order filing.
- 3. Defendant recently retained counsel to participate in settlement discussions with the Plaintiff. Thus, another law firm has been retained strictly to assist in settlement discussions. It will take a little time, at least, for that firm to get "up to speed" for such discussions. Moreover, the parties hope that this will facilitate a settlement of the case, thereby obviating the preparation and filing of the Pretrial Order.

4. The parties jointly submit that a 60-day extension of time for the filing of the Pretrial Order would help facilitate meaningful settlement discussions and would allow the parties to concentrate on such discussions without having to devote the time and expenses in preparing the Pretrial Order.

5. Accordingly, the parties respectfully and jointly ask for a 60-day extension for filing of the Pretrial Order to and including January 6, 2020. The parties submit that this would be in the interest of justice and judicial economy and would not unduly delay the orderly administration of this case.

WHEREFORE, the parties to this action respectfully request a 60-day extension for filing the Pretrial Order to an including January 6, 2020.

BUDOW AND NOBLE, P.C. LLP

/s/ Walter E. Gillcrist, Jr.

Walter E. Gillcrist, Jr., Esq.
Maryland Bar No. 398328
12300 Twinbrook Parkway, 540
Rockville, MD 20852
T: 301-654-0896 – F: 301-907-9591
Attorneys for Plaintiff, Joann Nagy

DENNETT WINSPEAR, LLP

/s/ Gina Gilbert Winspear

Gina Gilbert Winspear, Esq. Nevada Bar No. 5552 3301 N. Buffalo Drive, Suite 195 Las Vegas, NV 89129 T: 702-839-1100 – F: 702-839-1113 Attorneys for Plaintiff, Joann Nagy

IT IS SO ORDERED.

LINCOLN, GUSTAFSON & CERCOS,

/s/ Caroline Reilly

Caroline Reilly, Esq.
Nevada Bar No. 13236
3960 Howard Hughes Parkway, 200
Las Vegas, NV 89169
T: 702-257-1997 – F: 702-257-2203
Attorneys for Defendant, Bellagio, LLC

UNITED STATES MAGISTRATE JUDGE

Date: November 4, 2019

Case No.: 2:18-cv-01649-GMN-DJA